

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

In re Tenaris S.A. Securities Litigation

Case No. 1:18-cv-07059-KAM-SJB

Honorable Kiyo A. Matsumoto

**LEAD PLAINTIFFS' NOTICE OF UNOPPOSED MOTION FOR
(I) PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT;
(II) CERTIFICATION OF THE SETTLEMENT CLASS; AND
(III) APPROVAL OF NOTICE TO THE SETTLEMENT CLASS**

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS
OF RECORD HEREIN:

PLEASE TAKE NOTICE that Court-appointed Lead Plaintiffs Jeffrey Lynn Sanders and Starr Sanders (collectively, “Plaintiffs”), will and hereby move this Court on a date and at such time as may be designated by the Honorable Kiyo A. Matsumoto, Courtroom 6C South, United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, 11201, for an order: (i) granting preliminary approval of the proposed Settlement; (ii) certifying the Settlement Class for purposes of settlement only; (iii) granting approval of the form and manner of giving notice of the proposed Settlement to Settlement Class Members; and (iv) setting a date for a final Settlement Hearing and deadlines for providing notice of the Settlement, the filing of Settlement Class Member objections, the submission of requests for exclusion by Settlement Class Members, the filing of Plaintiffs’ motion for final approval of the Settlement, and the filing of Lead Counsel’s application for attorneys’ fees and expenses.¹

This motion is based upon the concurrently filed Memorandum of Law, the Wolke Declaration, and other such matters and argument as the Court may consider at the hearing on this motion. Defendants, as defined in the Stipulation, do not oppose this motion.

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated March 3, 2023 (the “Stipulation”), which is attached as Exhibit 1 to the Declaration of Kara M. Wolke in Support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (“Wolke Declaration”).

Dated: March 10, 2023

By: s/ Kara M. Wolke

Kara M. Wolke (admitted *pro hac vice*)

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*Attorneys for Lead Plaintiffs and the
Settlement Class*

PROOF OF SERVICE

I hereby certify that on this 10th day of March 2023, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

s/ Kara M. Wolke
Kara M. Wolke